

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. \_\_\_\_\_  
v. : DATE FILED \_\_\_\_\_  
CHRISTOPHER KIESEL : **VIOLATIONS:**  
18 U.S.C. § 2113(a)(bank robbery - 3  
counts)  
Notice of additional factors

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about October 18, 2004, in Philadelphia, in the Eastern District of Pennsylvania,  
defendant

**CHRISTOPHER KIESEL**

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of  
the Wachovia Bank, 1246 E. Hunting Park, Philadelphia, Pennsylvania, lawful currency of the  
United States, that is, approximately \$4,503, belonging to, and in the care, custody, control,  
management and possession of Wachovia Bank, the deposits of which were insured by the  
Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 22, 2004, in Philadelphia, in the Eastern District of Pennsylvania,  
defendant

**CHRISTOPHER KIESEL**

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Wachovia Bank, 7048 Castor Ave., Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$3,000, belonging to, and in the care, custody, control, management and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 25, 2004, in Philadelphia, in the Eastern District of Pennsylvania,  
defendant

**CHRISTOPHER KIESEL**

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Wachovia Bank, 6420 Frankford Ave., Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$1,600, belonging to, and in the care, custody, control, management and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

**NOTICE OF ADDITIONAL FACTORS**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. In committing the offense charged in Counts One, Two and Three of this indictment, defendant **CHRISTOPHER KIESEL**:

a. Took the property of a financial institution, as described in U.S.S.G. § 2B3.1(b)(1).

b. Made a threat of death, as described in U.S.S.G. § 2B3.1(b)(2)(F).

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
PATRICK L. MEEHAN  
United States Attorney